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Van Waters & Rogers Inc.
subsidiary of **Univar**

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FILE COPY

June 8, 1990

Ms. Judy Johndohl
Department of Environmental Quality
811 S.W. Sixth Avenue
Portland, OR 97204

Dear Ms. Johndohl:

To confirm our conversation of yesterday, the following is a summary of the event that took place at our Portland facility on June 6, 1990, and steps we have taken to prevent future occurrences.

We had just completed mixing a 3,900 gallon blend in our 8,000 gallon stainless steel, aboveground blend tank. The blend consisted of approximately:

2,000 gallons of tap water
350 gallons of Phosphoric Acid 75%
1,500 gallons of Nitric Acid 42°
40 gallons of a cleaning compound

The valve at the bottom of the tank is a 3" valve of stainless steel construction. Between the valve and the tank there was a short nipple made out of mild steel. The blend solution ate through the mild steel nipple causing the valve to fall off the tank, thus releasing the product into our diked area. All of the product was contained inside the concrete dike.

Our management immediately implemented the plant Emergency Contingency Plan upon discovery of the leak. Both external agency and internal company notifications of the leak were made and, in fact, representatives from the fire department and the city came to our facility to observe/respond. We added Liquid Caustic Soda and water to the material inside the dike, to begin the process of neutralization and dilution.

Duane Linnertz, Inspector from the City of Portland, Industrial Waste Management Division, observed our actions during part of the neutralization activities. We transferred batches, approximately 1,000 gallons each, to our neutralization facility by pumping, and continued the pH adjustment. Mr. Linnertz obtained a sample of the material and had his lab run an analysis to verify that no contamination existed in the solution.

On June 7, 1990 he verified to us that the material, as neutralized, fit the criteria of our permitted discharge and approved its introduction into the city sewer system. None of the solution went into the sewer prior to Mr. Linnertz's approval. Van Waters & Rogers will have an independent laboratory analyze samples from each of the subsequent neutralized batches.

We had neutralized the materials in the neutralization tank and had checked it periodically with pH paper. When the solution appeared neutralized, a representative sample was taken to our lab. After our chemist verified that the material had a neutral pH, the information was logged into our Neutralization Tank Discharge Book, and the material was pumped into the sewer system, according to our agreement with the city. These steps were repeated three more times to completely empty our containment dike.

Our 8,000 gallon blend tank has been tagged and taken out of service. We have ordered stainless steel parts to replace black iron parts. The tank will remain out of service until the parts are installed and management has approved returning the equipment to service. This should be accomplished on June 9, 1990.

If you have any further questions, please feel free to contact me.

Sincerely,

VAN WATERS & ROGERS INC.

Kirk A. Steinseifer
Area Operations Manager

KAS:jmc

Facility: Van Waters and Rogers, Portland

ID No: ORD 00922 7398 **Date of Inspection:** September 10, 1990
Date of Report: January 11, 1991

Address: 3950 N.W. Yeon Avenue
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Purpose:

This inspection was conducted to gather information on the facility's compliance with applicable regulations for management of hazardous wastes under the Resource Conservation and Recovery Act as amended by the Hazardous and Solid Waste Amendments of 1984 (RCRA).

The Oregon Department of Environmental Quality (DEQ) is authorized to regulate the management of hazardous waste in Oregon in lieu of the federal government except for certain provisions contained in the Hazardous and Solid Waste Amendments of 1984. This inspection was conducted by EPA with the agreement of DEQ.

Background Information:

Van Waters and Rogers (VWR) operates a chemical distribution plant in Portland, OR. The facility has operated as a hazardous waste generator, transporter, recycler and storage facility. The facility did not treat, store or dispose hazardous waste in land disposal units.

We noted one manifest, number 89001, describing a shipment of drums containing U wastes to USPCI in Utah. George Sylvester stated that the drums contained soil from drilling conducted as part of the RCRA Facility Investigation. He said that as far as he knows the drums were buried.

We asked the facility to provide copies of manifests and Land Disposal Restriction Notices with the following Manifest Document Numbers: 89001, 89002, 90005, 90004, 13190, 20290.

Contingency Plan

We asked to see a copy of the contingency plan. Kirk Steinseifer provided a copy of the plan and showed us copies of letters dated April 17, 1990 transmitting contingency plans to ODEQ, the Sheriff, the Fire Department, the Industrial Clinic, and the Portland Police.

Kirk Steinseifer said that a new contingency plan had just been prepared but had not yet been distributed. He said that the copy he gave me will remain in effect until the updated plan is distributed. Following the inspection, I received a copy of the updated contingency plan by letter dated September 28, 1990.

Field Inspection:

In addition to conducting the hazardous waste inspection, Rene Fuentes and I observed the ground water monitoring wells at the facility, and discussed the progress of the RCRA Facility Investigation with George Sylvester and Stan West. Details of that portion of the site visit are not included in this report.

I also observed the Convoy property which borders the southeastern portion of VWR. I saw a rectangular area of dirt on the Convoy property. George Sylvester told me Convoy is landfarming contaminated soil. Two sprinklers were wetting down the soil. Water was running off the soil and draining along the asphalt, under the chain link fence and onto VWR property and into a drain next to the fence on the VWR side (see photographs 8 and 9, Appendix 7). George Sylvester told me the drain is a storm drain.

Laboratory

In the laboratory we observed several closed containers of materials including flammable waste, chlorinated compounds and freon. I was told that the flammable wastes are sold by the facility as lacquer thinner, chlorinated compounds are sold as Vanscope, which is used for cleaning, and freon is sold as Vanfluoron. I saw a fire extinguisher in the laboratory with a tag showing it was inspected on 9/7/90.

drums. The inspection tag on the fire extinguisher was dated 9/7/90.

Corrosives Treatment Vats

We moved south from the loading dock. Kirk Steinseifer told me that when customers send drums that used to contain acids or bases, the remaining contents of the drums are poured into a 1200 gallon fiberglass vat. The facility adjusts pH and the contents are moved via a valve to a second 1200 gallon vat. Kirk Steinseifer said that once the contents cool they are sampled and discharged to the sewer.

Looking back at the loading dock, I observed a drain in the loading dock under drums that the facility representatives said were empty. Stan West told me that the drain leads to the sanitary sewer.

Hazardous Waste Accumulation Area

The hazardous waste accumulation area (photographs 5 and 6, Appendix 7) is concrete and is not covered. The area is not fenced and has no secondary containment. There was no hazardous waste in storage in this area during our inspection. The area is immediately adjacent to a door into the warehouse.

The closest communication device is at the Receiving Office around the corner of the warehouse.

I was told that Rick Matchett and Bill Kelly empty incoming drums into the satellite drums on the loading dock, and transport drums from the loading dock to the hazardous waste accumulation area. I was told that Dick Tarr and Jerry Jones inspect the hazardous waste accumulation area.

I observed two large containers labeled "response kits". I was told they contained spill response equipment. One was located outside, south of the hazardous waste accumulation area, and the other was located inside the warehouse, on the northeastern wall. The approximate locations of the kits are labeled on the map attached to this report.

The closest fire extinguisher to the hazardous waste accumulation area that I saw was inside the fill shed, next to a door (see map). The inspection tag on the fire extinguisher was dated 9/7/90. There was another fire extinguisher with the same date on the inspection tag inside the cotton shed in the northeast corner.

Still and Hazardous Waste Storage Area

Appendix 3	Manifests received during the inspection
Appendix 4	Training records received during the inspection
Appendix 5	Spill report received during the inspection
Appendix 6	Checklist
Appendix 7	Photographs

4. A person working at the hazardous waste accumulation area does not have immediate access to a telephone, alarm button, or other communication device as required in 40 C.F.R. § 265.34(a).

APPENDIX 2

Map of Facility

9/10/90